Example Notification of Compliance Status (NOCS)

THIS IS A SAMPLE NOTIFICATION FORM THAT CAN BE USED BY FACILITIES AT THEIR DISCRETION TO MEET COMPLIANCE WITH 40 CFR 63.753

Applicable Rule: 40 CFR Part 63, Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities. This NOCS is being made in accordance with §63.753 and §63.9(h).

Note: Notification of Compliance Status (NOCS) reports are due May 1, 1999. The reporting period is from Sept 1, 1998 (compliance date) to Feb 28, 1999.

SECTION I
GENERAL INFORMATION

(1) If you've been issued a title V permit, don't proceed. Submit your NOCS in accordance with your title V permit [63.9(h)(3)].

(2) If you haven't been issued a title V permit, fill out the remaining portions of this section and also complete Sections II-X [63.9(h)(2)(i)].

(3) Print or type the following information for each plant in which aerospace manufacturing and rework operations are performed:

Owner/Operator/Title _____
Street Address _____
City _____ State _____ Zip Code: _____
Plant Name _____
Plant Contact/Title _____
Plant Contact Phone Number (optional) _____
Plant Address (if different than owner/operator's) _____
Street Address _____
City _____ State _____ Zip Code: _____

SECTION II
CERTIFICATION
[Example wording only]

I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate [63.9(h)(2)(i)]. The above-mentioned facility _____ (has/has not) complied with applicable requirements in 40 CFR 63, Subpart GG and other applicable requirements referenced in Subpart GG [63.9(h)(2)(i)(G)].

Signature, Responsible Official _____ Date _____

Note: Responsible Official is defined in 40 CFR 63.2 (General Provisions Definitions)

Name of Responsible Official (please print) _____

Title: _____

SECTION III

Describe the methods you used to determine compliance [63.9(h)(2)(i)(A)]

See Appendix A for example response

SECTION IV

Describe the results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted [63.9(h)(2)(i)(B)]

See Appendix B for example response

SECTION V

Describe the methods you'll use to determine continuous compliance, including a description of monitoring and reporting requirements and test methods [63.9(h)(2)(i)(C)]

See Appendix C for example response

SECTION VI

Describe the type and quantity of hazardous air pollutants (HAP) emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard [63.9(h)(2)(i)(D)]

See Appendix D for example response

SECTION VII

An analysis demonstrating whether the affected source is a major source or an area source (using the emissions data generated for this notification) [63.9(h)(2)(i)(E)]

See Appendix E for example response

SECTION VIII

Describe the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method) [63.9(h)(2)(i)(F)]

See Appendix F for example response

SECTION IX

Submitting corrected data.

Did you submit an application for construction or reconstruction under 63.5(d) which contained preliminary or estimated data? [63.9(h)(5)]

Yes ☐ No ☐ Not applicable, didn't submit an application for construction or reconstruction ☐

If yes, provide actual emission data or other corrected information below.

SECTION X
Additional NOCS reporting requirements under Subpart GG

(1) Provide information detailing whether the source has operated within the specified ranges of its designated operating parameters [63.753(a)(i)].

See Appendix G for example response

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(2) For each coating line, [provide information on] where averaging will be used [and include] the types and quantities of coatings the facility expects to use in the first year of operation [63.753(a)(ii)].

See Appendix G for example response

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(3) Has your averaging scheme been approved by the Administrator or delegated authority? [63.753(a)(ii)]

Yes ☐ No ☐ Not applicable, don't use averaging ☐

(4) Has your averaging scheme been included as part of your facility's title V or part 70 permit? [63. 753(a)(ii)] Yes ☐ No ☐ Not applicable, don't use averaging ☐

(5) Do you use a dedicated solvent recovery device to demonstrate initial and continuous compliance with 63.745(d), 63.746(c), or 63.747(d)? [63.750(g)(1)]

Yes ☐ No ☐ Not applicable, don't use a dedicated solvent recovery device ☐

If yes, describe the results of the material balance calculations performed to demonstrate initial compliance in accordance with 63.750(g)(1).

END OF FORM. Form must be signed by a Responsible Official - See Section II.

DRAFT EXAMPLES - NOTE: This is an example report based on a fictitious facility. Information submitted by affected facilities will vary in format and content.

Appendix A
Section III - Example Response
Compliance Methods Used

General Information. The following lists compliance methods used for the period between 9/1/98 and 2/28/99. For affected operations, the above-mentioned facility first determined the applicability of each operation to requirements in Subpart GG. A list of exempt operations is available upon request but has not been included in this notification unless specific compliance methods were required within the rule. All Material Safety Data Sheets (MSDSs) or other technical information is maintained on-site and is available for review upon request. The above-mentioned facility no longer performs **chemical milling maskant operations** in accordance with 63.747.

(1) **General cleaning requirements**. The facility used two general cleaning compliance options as allowed under 63.744(a) during the reporting period. These included using solvents that met composition requirements and instituting work practice measures. All of the following methods were used to determine compliance:

(a) Checked MSDSs and other technical data to determine if solvent used met the criteria for aqueous or hydrocarbon based solvents under Table 1 of 63.744(a).

(b) For solvents not meeting Table 1 criteria, instituted work practices as identified in 63.744(a)(1)-(3). Posted guidance on requirements for work practices.

(c) For all cleaning solvents (including those used for hand-wipe, spray gun and flush cleaning) , maintained MSDSs and other technical data that showed name of solvent, vapor pressure, and organic HAP constituents as required in 63.752(b)(1).

(2) **Hand wipe cleaning requirements**. The facility used two wipe cleaning compliance options as allowed under 63.744(b) during the reporting period. These included using solvents that met composition requirements and composite vapor pressure limits. All of the following methods were used to determine compliance:

(a) Checked MSDSs and other technical data to determine if solvent used met the criteria for aqueous or hydrocarbon based solvents under Table 1 of 63.744(a), or met the composite vapor pressure requirements in 63.744(b)(2).

(b) For blended solvents, calculated the composite vapor pressure by following procedures in 63.750(b). Maintained calculation sheets with appropriate MSDS.

(c) Tracked purchases of solvents meeting Table 1 criteria in accordance with 63.752(b)(2), or 63.752(b)(3) for solvents meeting the composite vapor pressure.

(d) Developed a list of exempt cleaning operations where solvents used didn't conform to 63.744(a) or 63.744(b)(2) and tracked usage in accordance with 63.752(b)(4).

(3) **Spray gun cleaning requirements**. The facility used three spray gun cleaning compliance options as allowed under 63.744(c). These included using enclosed system cleaning, nonatomized cleaning and disassembled gun cleaning. All of the following methods were used to determine compliance:

Appendix A contd

(a) Inspected spray gun cleaning areas to determine compliance with allowable methods in 63.744(c)(1)-(4). Posted guidance on acceptable gun cleaning practices.

(b) Performed monthly inspections on enclosed spray gun cleaners in accordance with 63.751(a) and recorded results in accordance with 63.752(b)(5). Repaired detected leaks within 15 days or shut down operation in accordance with 63.744(c)(1)(ii).

(4) **Flush cleaning requirements.** The facility used three flush cleaning compliance options as allowed under 63.744(d). These included using solvents that met composition requirements, using semi-aqueous cleaners and using an enclosed collection system. All of the following methods were used to determine compliance:

(a) Checked MSDSs and other technical data to determine if solvent used met the criteria for aqueous or hydrocarbon based solvents under Table 1 of 63.744(a), or for semi-aqueous cleaners under 63.744(d)

(b) For solvents not meeting Table 1 or semi-aqueous criteria, ensured that all flush cleaning equipment conformed to the closed system requirements in 63.744(d). Labeled all equipment with instructions to keep containers closed when not in use.

(c) Tracked purchases of solvents meeting composition requirements or which were aqueous cleaners in accordance with 63.752(b)(2).

(5) **Coating requirements for organic HAP.** The facility used five organic HAP compliance options as allowed under 63.745. These included using appropriate application techniques, compliant coatings, low HAP coatings, averaging and waterborne coatings. All of the following methods were used to determine compliance:

(a) Posted guidance on requirements for work practices to minimizing spills in coating and mixing areas.

(b) Inventoried coating application methods and removed from the premises all application methods not listed in 63.745(f). Obtained manufacturer instructions, or developed in-house instructions, for application devices and instituted a required reading policy for all users to ensure that equipment is operated in accordance with 63.745(f)(2).

(c) Checked MSDSs and other technical data to determine if coatings used met the maximum VOC/HAP content in accordance with 63.745(e)(1) - compliant coatings, 63.741(i) - waterborne coatings, and 63.752(c)(3) - low HAP coatings. Changed supply of coatings to pre-measured kits to ensure “as supplied” VOC/HAP content was maintained. Limited locations where thinning solvents were authorized and instituted recordkeeping for “as applied” coatings.

(d) Maintained all of the following information: MSDSs for “as supplied” coatings; calculations showing the value of H_i and G_i for “as applied” coatings in accordance with 63.750(c) and (e); and calculations showing the value of H_a and G_a for averaged “as applied” coatings in accordance with 63.750(d) and (f). Tracked purchases of coatings in accordance with 63.762(c)(2) for compliant coatings; 63.752(c)(3)(i) for low HAP coatings; and 63.741(i) for waterborne coatings.

Appendix A contd

(e) Obtained pre-approval of averaging scheme from permitting agency in accordance with 63.745(e)(2) and maintained records for averaged coatings as identified in 63.752(c)(4).

(6) **Coating requirements for inorganic HAP.** The facility used the two stage filter option for existing coating operations as allowed under 63.745(g). All of the following methods were used to determine compliance:

(a) Purchased paint filters meeting filter efficiencies in 63.745(g)(2)(i). Maintained certification letters from the manufacturer that filters met criteria based on Method 319 testing in accordance with 63.750(o).

(b) Read and recorded the pressure differential once per shift in accordance with 63.745(g)(2)(iv) and 63.752(d)(1). Shut down booth and took corrective action whenever the pressure drop exceeded or fell below the manufacturers recommendation in accordance with 63.745(g)(2)(iv). Posted guidance on maintenance, acceptable pressure limits, and corrective action procedures if pressure drop falls below acceptable limits.

(c) Obtained manufacturer instructions for dry particulate filter use and instituted a required reading policy for all users. Operated and maintained equipment in accordance with manufacturers instruction - no Startup, Shutdown and Malfunction Plan (SSMP) was developed since booth was operated in accordance with instructions.

(7) **Depainting requirements.** The facility used four depainting compliance options as allowed under 63.746. These included using non-HAP chemical strippers, nonchemical based equipment, spot stripping/decal removal and HAP containing substitutes for no more than 15 days per year. All of the following methods were used to determine compliance:

(a) Checked MSDSs and other technical data to determine if strippers contained no HAP in accordance with 63.746(b)(1). Used no more than allowable spot stripping allowances under 63.746(b)(3). Maintained usage records for spot stripping operations in accordance with 63.752(e)(1)(i)-(ii) and 63.752(e)(6).

(b) Obtained manufacturer instructions, or developed in-house instructions, for all non-chemical depainting equipment (such as pneumatic sanders) and instituted a required reading policy for all users. Operated and maintained equipment in accordance with manufacturers instructions. Maintained records showing that HAP containing products used as substitutions during malfunctions were used no more than 15 days annually in accordance with 63.746(b)(2) and 63.752(e)(5).

(c) Inspected dry media blasting facilities to ensure blasting was performed in enclosed areas in accordance with 63.746(b)(4). Purchased filters meeting efficiency data points in 63.745. Maintained certification letters from the manufacturer that filters met criteria based on Method 319 testing in accordance with 63.750(o). Read and recorded the pressure differential once per shift in accordance with 63.751(d) and 63.752(e)(7). Posted guidance on maintenance, acceptable pressure limits, and corrective action procedures if pressure drop falls below acceptable limits.

(d) Developed Startup, Shutdown and Malfunction Plan (SSMP) for dry media blast booth in accordance with 63.743(b).

Appendix B

DRAFT EXAMPLES - NOTE: This is an example report based on a fictitious facility. Information submitted by affected facilities will vary in format and content.

Section IV - Example Response

Monitoring Results

The above-mentioned facility does not conduct any operations that are subject to performance testing (except for Method 319 filter manufacturer certification), opacity or visible emissions observations, or continuous monitoring system (CMS) performance evaluations under 40 CFR 63.751. Manufacturer Method 319 filter certifications are maintained on site and are available for review upon request.

During the reporting period, this facility followed monitoring procedures under 63.751(a) - spray gun cleaning using enclosed systems; 63. 745(g)(2)(iv) - inorganic HAP coating applications; and 63.746(b)(4)(iii) - depainting using dry particulate filters. Monitoring procedures included visual inspections and gauge readings. We obtained the following results for monitoring conducted between 9/1/98-2/28/99:

Monitoring Results

Spray Gun Cleaners (enclosed)

Source ID	Source Location	*Result*[1] Sept 98	Oct 98	Nov 98	Dec 98	Jan 99	Feb 99
CLEAN-1	Bldg 510, Paint Shop	9/1 - OK	10/1 - seal broke (repaired 10/10)[2]	11/2 - OK	12/1 - OK	1/1 - OK	2/1 - OK
CLEAN-3	Hangar 2	9/1 - OK	10/1 - valve broke (shut down 10/13)[3]	11/2 - shut down	12/1 - shut down	1/1 - OK (repaired 12/31)	2/1 - OK

[1] equipment visually checked monthly while operating. OK means that the seals and other potential sources of leaks were visually inspected and no leaks were found.

[2] did not shut down system since the above-mentioned facility repaired CLEAN-1 within 15 days required in 63.744(c)(1)(ii).

[3] removed solvent and shut down system since the above-mentioned facility tried, but could not repair, CLEAN-3 within 15 days as required in 63.744(c)(1)(ii). Disassembled gun cleaning used during shutdown period.

DRAFT EXAMPLES - NOTE: This is an example report based on a fictitious facility. Information submitted by affected facilities will vary in format and content.

Appendix B contd

Monitoring Results

Pressure Drop Log - Inorganic HAP Spray Painting

(acceptable differential pressure range = 0.14 - 1.14" W.G. using a two stage filter (MF#1235))

Source ID	Source Location	*Results*[4] Sept 98	Oct 98	Nov 98	Dec 98	Jan 99	Feb 99
PAINT-2	Hangar 2	pressure w/in range	w/in range	pressure 0.10, shutdown, replaced filters[5]	w/in range	w/in range	w/in range

[4] Information from actual logs has been condensed here due to the extensiveness of records maintained. The paint booth in Hangar 2 operates 7 days per week using 3 shifts. Pressure differential is recorded once per shift. All backup documentation is available upon request.

[5] Pressure drop fell below limits on 11/5/98, 2ed shift. Booth immediately shut down in accordance with 63.745(g)(2)(iv) and replaced the first and second stage filters as per manufacturers recommendation.

Monitoring Results

Pressure Drop Log - Dry Particulate Filter Depainting

(acceptable differential pressure range = 0.18 - 1.19" W.G. using MR#125 filters)

Source ID	Source Location	*Results*[6] Sept 98	Oct 98	Nov 98	Dec 98	Jan 99	Feb 99
STRIP -1	Bldg 510, Depaint Shop	pressure w/in range	w/in range	w/in range	w/in range	w/in range	w/in range

[6] Information from actual logs has been condensed here due to the extensiveness of records maintained. The blast booth in Bldg 510 operates 7 days per week using 3 shifts. Pressure differential is recorded once per shift. All backup documentation is available upon request.

Appendix C
Section V - Example Response
Demonstrating Continuous Compliance

The above-mentioned facility will determine continuous compliance with applicable Subpart GG requirements by continuing to use monitoring methods as identified in Section III (a) - (g) and Section IV. In addition, the facility also plans to do all of the following:

(1) perform periodic unannounced inspections in areas where work practice measures were implemented.

(2) submit semiannual compliance reports signed by a responsible official in accordance with all applicable requirements in 63.753(b) - cleaning; 63.744(b) - hand-wipe; 63.753(b) - spray gun; 63.763(c) - organic HAP; 63. 753(c) - inorganic HAP; and 63.753(d) - depainting.

Appendix D
Section VI - Example Response
HAPs Emitted

The following Hazardous Air Pollutants (HAPs) were emitted by affected sources at the above-named facility during the period 9/1/98 - 2/28/99: Please note that the above-mentioned facility has chosen to segregate out it's emissions according to it's affected sources (as defined by Subpart GG) due to ease of reporting and recordkeeping (by that we mean, that's how we kept our records). [Owners or operators may choose other groupings of emission points]

Source ID	Source Location	Source Description	HAPs Used	HAPs Emitted (tons)[1]
N/A	Bldg 510, 550, Hangar 1, Hangar 2, Flight Line	Wipe-cleaning operations	Toluene; Xylene; MEK; Ethylbenzene	1.136
CLEAN- 1	Bldg 510	Spray gun cleaning operations	Toluene; Xylene; MEK; Ethylbenzene	0.068
CLEAN-3	Hangar 2	Spray gun cleaning operations	Toluene; Xylene; MEK; Ethylbenzene	0.227
CLEAN - 4, 5, 6 and 7[2]	Bldg 510, 550, Hangar 1, Hangar 2	Flush cleaning operations	Methylene Chloride; Phenol	0.419
PAINT- 1, 2 and 3	Bldg 510, Hangar 2, Flight Line	Organic primer and topcoat application (flight line operations are "touch-up" only)	Epichlorohydrin; Ethylbenzene; Formaldehyde; Glycol ethers; Methanol; MEK; MIBK; Methylene Chloride; Toluene; Xylene (mixed)	2.036
PAINT-2	Hangar 2	Inorganic primer application	Cadmium Compounds	0.001
STRIP-1	Bldg 510	Depainting - Plastic media blasting	Lead & Cadmium Compounds	0.0006
STRIP-2	Bldg 550, Hangar 1, Flight Line	Depainting - Spot Stripping	Methylene Chloride	0.028
MILL-1[3]	Hangar 2	Type I and II maskant	NA	NA
N/A	Bldg 510, 550, Hangar 1, Hangar 2, Flight Line	Store and handle waste	NA	work practice measures
			Total HAP emitted	3.916 tons

[1] reported in tons emitted for the reporting period. Detail records available upon request.

[2] not previously identified in the initial notification form

[3] chemical milling maskant operations identified in initial notification but are no longer performed at facility

Appendix E
Section VII - Example Response
Major Source Determination

As illustrated in Section VI, the emissions during the reporting period were below major source thresholds for affected sources subject to Subpart GG. The above-mentioned facility doesn't expect these sources to emit HAPs in quantities greater than the major source thresholds. The above-mentioned facility, however, is classified as a major source due to its potential plant-wide emissions of trichloroethylene in quantities greater than 10 tons per year.

Appendix F
Section VIII - Example Response
Control Equipment

All of the following pollution control equipment is used at affected sources within the above-mentioned facility.

Pollution Control Equipment Used

Source ID	Source Location	Equipment Type	Type of Control Device	Control Efficiency	HAPs Controlled
PAINT-2	Hangar 2	Paint Booth	dry particulate filters (2 stage)	meets all efficiencies in 63.745(g)(2)(i) - >90,50, 10%[1]	inorganic
STRIP-1	Bldg 510, Paint Shop	Plastic Media Blast Booth	dry particulate filters (HEPA, cylinder type)	meets all efficiencies in 63.745(g)(2)(i) - >90,50,10%[1]	inorganic

[1] certifications maintained on-site.

Other Methods Used to Control Air Pollution

The above-mentioned facility, also uses other methods to comply with Subpart GG that don't involve using pollution control equipment. We've identified those compliance methods below.

[**NOTE**: The first affected source is the example. The remaining table has been left blank for those who wish to use it.]

Appendix F contd

Source ID	Source Location	Source Description[1]	Options Available for Use[2]	Option Used
N/A	Bldg 510, 550, Hangar 1, Hangar 2, Flight Line	General cleaning	Option 1: Compliant cleaners	✓ yes ☐ no
			Option 2: Work practice standards	✓ yes ☐ no
N/A	Bldg 510, 550, Hangar 1, Hangar 2, Flight Line	Wipe-cleaning operations	Option 1: Compliant cleaners	☐ yes ☐ no
			Option 2: VP compliant	☐ yes ☐ no
			Option 3: Volume reduction	☐ yes ☐ no
CLEAN-1 and3	Bldg 510, Hangar 2	Spray gun cleaning operations	Option 1: Enclosed system	☐ yes ☐ no
			Option 2: Nonatomized cleaning	☐ yes ☐ no
			Option 3: Disassembled cleaning	☐ yes ☐ no
			Option 4: Atomized cleaning	☐ yes ☐ no
CLEAN-4, 5, 6 and 7	Bldg 510, 550, Hangar 1, Hangar 2	Flush cleaning operations	Option 1: Compliant solvents	☐ yes ☐ no
			Option 2: Enclosed system	☐ yes ☐ no
PAINT-1, 2 and 3	Bldg 510, Hangar 2, Flight Line	Organic primer and topcoat application (flight line operations are “touch-up” only)	Application equipment	☐ yes ☐ no
			Option 1: Compliant coatings	☐ yes ☐ no
			Option 2: Low HAP coatings	☐ yes ☐ no
			Option 3: Averaged coatings	☐ yes ☐ no
			Option 4: Controlled coatings (see section VIII)	☐ yes ☐ no
			Option 5: Waterborne coatings	☐ yes ☐ no
STRIP-1 and 2	Bldg 510, 550, Hangar 1, Flight Line	Depainting	Option 1: Non-HAP strippers	☐ yes ☐ no
			Option 2: Nonchemical equipment (see section VIII)	☐ yes ☐ no
			Option 3: Control device (see section VIII)	☐ yes ☐ no
STRIP-2	Bldg 550, Hangar 1, Flight Line	Depainting - Spot Stripping	We use the commercial option	☐ yes ☐ no
			We use the military option	☐ yes ☐ no
MILL-1	Hangar 2	Apply Type I and II maskant	Option 1: Compliant maskants	☐ yes ☐ no
			Option 2: Averaged maskants	☐ yes ☐ no
			Option 3: Controlled maskants (see section VIII)	☐ yes ☐ no
			Option 4: Waterborne maskants	☐ yes ☐ no

DRAFT EXAMPLES - NOTE: This is an example report based on a fictitious facility. Information submitted by affected facilities will vary in format and content.

Source ID	Source Location	Source Description[1]	Options Available for Use[2]	Option Used
N/A	Bldg 510, 550, Hangar 1, Hangar 2, Flight Line	Store and handle waste	Work practice standards	☐ yes ☐ no

[1] Inorganic topcoat and priming operations not indicated on table since control device is required. This information is presented in Section VIII

[2] option numbers correspond with those identified in EPA-456/R-97-006, Summary of Requirements for Implementing the NESHAP [Aerospace NESHAP]

Appendix G
Section X(a) - Example Response
Other Required Information

As indicated in Section IV, the above-mentioned facility did identify leaks in the enclosed gun cleaners CLEAN-1and CLEAN-3 on 10/1/99. However, equipment was repaired or shut down within the 15 days in accordance with 63.744(c)(1)(ii).

Also, as indicated in Section IV, the above-mentioned facility recorded the pressure drop across PAINT-2 on 11/5/98, 2ed shift out of range from the manufacturers recommendation. However, the booth was immediately shut down in accordance with 63.745(g)(2)(iv) and the filters replaced.

Section X(b) - Example Response

The following coating lines are anticipated to be used between 8/1/98 - 8/1/99.

Coating Line Information

Source ID	Source Location	Type of Coating	HAPs Emitted	Est Amount Coating Used[1]	Is averaging used at location?
PAINT-1	Bldg 510, Paint Shop	Primer, topcoat[2] and touch-up	inorganic	125-500 gal	Not at this time
PAINT-2	Hangar 2	Primer, topcoat[2] and touch-up	organic and inorganic	1000 - 3500 gal	Yes[3]
PAINT-3	Flight Line	touch-up	inorganic and organic	25 - 35 gal	No

[1] usage amounts based on estimated values only and exclude exempt or specialty coatings.

[2] includes self-priming topcoats

[3] about 10% of primers and 15% of topcoats will be averaged. Estimation based on 8/1/98-8/1/99 reporting period. Values for H_a and G_a, for the period between 8/1/98 and 2/28/99, were 2.84 lb/gal and 3.50 lb/gal.

END OF EXAMPLE